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November 20, 2019

Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Molina et al v. Tapper et al.**  
**19-cv-1425 (ENV)(LB)**

Your Honor:

This firm serves as counsel to Plaintiffs in the above matter. Subsequent to your order dated September 24, 2019, I was informed by Mr. Taubenfeld that he was being substituted as counsel by Mr. Hans, who filed his notice of appearance on November 8, 2019. As a result, we have not yet mediated this case. However, I have yet to receive a response from Defendants' new counsel regarding mediator selection.

Therefore, we respectfully request a control date for the parties to select a mediator and schedule the first mediation session. In the alternative, we request the Court schedule an initial conference so that discovery can move forward on this case.

We thank the Court for its assistance in this matter.

Sincerely,

Darren Rumack

c.c. Stephen Hans (via ECF)  
Attorney for Defendants